

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

OCT 18 1993

PUBLIC SERVICE  
COMMISSION

IN THE MATTER OF:

RISSIA DODD,

COMPLAINANT

VS.

UNION LIGHT, HEAT & POWER,  
DEFENDANT

NO. 93-385

COMPLAINT

The complaint of Rissia Dodd respectfully shows:

a) Rissia Dodd, unemployed, resides at 1527 Banklick Street, First Floor, Covington, Kentucky 41011;

b) The Defendant is the Union Light, Heat and Power Company (ULH&P), 107 Brent Spence Square, Covington, Kentucky 41011;

c) That Rissia Dodd applied for gas and electric service in her name in 1992 and at that time owed a bill to Cincinnati Gas and Electric Company (CG&E);

d) That Rissia Dodd was denied service by ULH&P until she agreed to have her CG&E bill added to her ULH&P bill and that she entered this agreement under duress;

e) That Rissia Dodd made payments on her ULH&P bill and transferred CG&E bill to the best of her ability but that her service was disconnected in the summer of 1993 because she had defaulted on the agreement to pay both of the bills;

f) That Rissia Dodd was able to pay \$300 to have her electricity reconnected but to this date, she has been unable to pay the gas portion of her combined bill;


g) That ULH&P's policy which required her to agree to have her bill transferred and their subsequent disconnect of her service because of her inability to pay the transferred bill, is a violation of Kentucky Public Service Commission Regulation 807 KAR 5:006, Section 14(1) and KRS 278.030;


WHEREFORE, Complainant Rissia Dodd asks:


1. That the PSC assume jurisdiction of this billing dispute and, pursuant to 807 KAR 5:006, Section 11, order ULH&P to immediately restore gas service to Complainant during the pendency of this case;

2. That the PSC order ULH&P to refrain from collecting debts owed to other companies and to return all money paid by Rissia Dodd towards the CG&E bill.

Dated at Covington, Kentucky this 14<sup>th</sup> day of October, 1993.

  
RISSIA DODD  
COMPLAINANT

  
CARL J. MELCHER  
ATTORNEY FOR COMPLAINANT  
Northern Kentucky Legal Aid  
Society, Inc.  
302 Greenup Street  
Covington, Kentucky 41011  
(606) 431-8200

  
ANTHONY G. MARTIN  
CO-COUNSEL FOR COMPLAINT  
Office of Kentucky Legal  
Services Programs  
201 West Short Street, #506  
Lexington, Kentucky 40507